



April 30, 2025

BY ECF AND EMAIL

Hon. Katherine Polk Failla, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, New York 10007
Failla_NYSDChambers@nysd.uscourts.gov

**Re: *Spectrum Management Holding Company, LLC v. IV Media, LLC*
d/b/a ShopHQ, Case No. 1:25-cv-02905 (KPF)**

Dear Judge Failla:

This firm represents Defendant IV Media, LLC d/b/a ShopHQ (“ShopHQ”) in the above-referenced action. We write pursuant to Rule 2(C) of Your Honor’s Individual Rules of Practice in Civil Cases to request that ShopHQ’s time to answer or otherwise respond to the Complaint (ECF No. 1) be extended from May 1, 2025 to June 2, 2025.

Plaintiff consents to this request upon the parties’ agreement that ShopHQ hereby waives any personal jurisdiction, venue or service of process arguments. The reason for this request is that we were recently retained as counsel in this matter and require additional time to confer with our client, assess the claims made in the Complaint, and prepare a response. There have been no prior requests for adjournment or extension of time in this matter.

We thank the Court for its consideration and respectfully request that our request for extension of time be granted.

Respectfully submitted,

/s/ Yonaton Aronoff

Yonaton Aronoff